

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

Gilbert *et al.*,

Civil No. 1:25-cv-00421-DDD-
JPM

Plaintiffs

VS.

Judge Drell

Harris County *et al.*,

Magistrate Judge
Perez-Montes

Defendants

PROPOSED PLAN OF WORK

On, the following individuals participated in a meeting X by video conference call on May 30, 2025 during which this Plan of Work was formulated: Stephen Weil, Romanucci & Blandin LLC (Plaintiffs); Deirdre C. McGlinchey, McGlinchey & Stafford PLLC (LaSalle defendants); Brandon B. Brown McGlinchey & Stafford PLLC (LaSalle defendants) Seth Hopkins and Gregory Burnett, Harris County Attorney's Office (Harris County Defendants).

Part A

Based on the information now reasonably available, the parties have agreed upon the following:

1. 5/14/26 Deadline for completion of fact discovery
2. 10/14/26 Final date for filing dispositive motions
3. 10/1/25 Final date for adding parties
4. 10/1/25 Final date for filing amended pleadings
5. 6/1/26 Plaintiffs' reports of experts due
6. 7/1/26 Defendants' reports of experts due
7. 7/15/26 Plaintiffs' rebuttal reports of experts due
8. 9/1/26 Final date for taking depositions of experts

9. 7/1/25 Date disclosures under Fed. R. Civ. P. 26(a) were made or will be made

10. Considering the subjects addressed by Fed. R. Civ. P. 26(f), the parties propose the following changes, limitations, or other matters: NONE

Part B

The following areas of disagreement, issues, or problems have arisen regarding the information set forth in Section A and/or the participation of counsel/unrepresented parties in the Plan of Work process: NONE.

6/10/2025

(Date)

/s/ Seth Hopkins

(Signature)

Seth Hopkins

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6/10/2025

(Date)

/s/ Gregory Burnett

(Signature)

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6/10/2025

(Date)

/s/ Deirdre C. McGlinchey

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6/10/2025

(Date)

/s/ Stephen Weil

(Signature)

Stephen Weil

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